



Fw: P66-Rail-ANSI/API Recommended Practice 3000

Ryan Hostetter to: Ramona Hedges
Cc: Ellen Carroll

04/14/2016 05:09 PM

Hey Ramona - Can you also forward this to the Commission if you did not do so already? First can you please check if they got this back in March just after the March 11th hearing (you may have already sent it to them)?

Thank You,

Mrs. Ryan Hostetter, AICP, LEED AP
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----- Forwarded by Ryan Hostetter/Planning/COSLO on 04/14/2016 05:07 PM -----

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Date: 03/11/2016 09:09 PM
Subject: P66-Rail-ANSI/API Recommended Practice 3000

Hi Ryan,

Attached is a pdf of the ANSI/API Recommended Practice 3000 that Commissioner Harrison asked for. As stated in the Final DOT rulemaking document, "API published a new set of recommended practices for testing and classifying crude oil for rail shipment and loading it into rail tank cars. These guidelines were the product of extensive work and cooperation between the oil and gas industry, the freight rail industry, and PHMSA to ensure crude shipments are packaged appropriately, and emergency responders have the right information. RP 3000 provides guidance on the material characterization, transport classification, and quantity measurement for overfill prevention of petroleum crude oil for the loading of rail tank cars. RP 3000 identifies criteria for determining the frequency of sampling and testing of petroleum crude oil for transport classification. It discusses how to establish a sampling and testing program, and provides an example of such a program. "

The Final rule document goes on to say, "Finally, we are not adopting API RP 3000 as a requirement at this time. As indicated in the NPRM [*Notice of Proposed Rule Making*], we did not contemplate or propose adopting API RP 3000 in the NPRM, as it had not yet been finalized. Furthermore, the boiling point test specified in the API RP 3000 does not align with the requirements currently authorized in the HMR [*Hazardous Material Regulations*]. Shippers must continue to use the testing methods for classification of flammable liquids outlined in § 173.120 and flammable gases in § 173.115. However, API RP 3000 is otherwise consistent with

the sampling program requirements in paragraph 173.41(a)(1)-(6) and may be used to satisfy these adopted sampling provisions . Furthermore, voluntary use of API RP 3000 provides guidance for compliance with these provisions , but still allows flexibility for meeting requirements through other methods .”

The HMR referred to above is 49 CFR parts 171-180 and pertains to tank car designs , speed restrictions, braking systems, routing, sampling and classification, and notification requirements related to certain trains transporting large quantities of flammable liquids .

Best Regards,
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Principal

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ANSI-API 3000.pdf